

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**DEARBORN LIFE INSURANCE
COMPANY d/b/a BLUE CROSS BLUE
SHIELD OF TEXAS,
Plaintiff**

vs.

**BALKEES ABDERRAHMAN,
ALEXANDRA K. L. NOEL, AND
HELEN M. Y. TURNER,
Defendants**

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Case No. 1:24-cv-1085-DII

AGREED RULE 26(f) DISCOVERY PLAN

COME NOW Balkees Abderrahman, Alexandra K. L. Noel, and Helen M. Y. Turner, the remaining parties in the above-captioned Interpleader action filed by Dearborn Life Insurance Company d/b/a Blue Cross Blue Shield of Texas (who was dismissed from this case through the Court's granting of an Agreed Motion), with this Agreed Discovery Plan pursuant to Fed. R. Civ. P. 26(f) and respectfully show the Court the following:

1. **Conference Between Counsel.** The parties hereto, through their respective counsel, participated in a Rule 26(f) conference by telephone on February 6, 2025, and agreed to the discovery plan set forth herein.

2. **Rule 26(a) Disclosures.** The parties agree to exchange Initial Disclosures pursuant to Rule 26(a) on or before March 14, 2025. No changes are necessary to the timing, form, or requirement for disclosures under Rule 26(a).

3. **Discovery.** The parties anticipate engaging in discovery on multiple issues relating to causes of action and/or defenses that have been pled and/or that the parties reasonably expect to seek leave of Court to plead in amended or supplemental pleadings. At this time, the parties do

not anticipate a need for discovery to be conducted in phases or to be limited to focus upon particular issues. The parties expect to complete discovery on or before February 2, 2026.

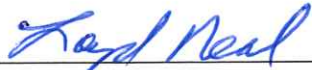
4. **Electronically Stored Information**. The parties are not aware of any issues at this time concerning the disclosure, discovery, or preservation of electronically stored information.

5. **Claims of Privilege**. The parties are not aware at this time of claims of privilege that are anticipated to materially affect discovery or the presentation of evidence.

6. **Limitations Upon Discovery**. The parties are not aware at this time of a need for changes to the limitations upon discovery imposed under the Federal Rules of Civil Procedure and/or any applicable local rule.

7. **Other Orders**. The parties anticipate submitting an Agreed Scheduling Order to the Court for the Court's consideration and have conferred regarding same. Counsel for Alexandra K. L. Noel and Helen M. Y. Turner served Subpoenas upon the University of Texas MD Anderson Cancer Center ("MD Anderson") and Luxe Mobile IV requesting the production of documents. Counsel for Balkees Abderahman anticipates filing a motion to quash and/or objections to the subpoena served upon MD Anderson. It is unknown whether MD Anderson or Luxe Mobile IV will seek Court protection or orders concerning such subpoenas.

Respectfully submitted,

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*Attorneys for Alexandra K.L. Noel and
Helen M.Y. Turner*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all counsel of record via the Court's CM/ECF system on February 12, 2025.

By: 
. Loyd Neal, III